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UNITED STATES BANKRUPTCY COURT
for the
DISTRICT OF NEW JERSEY

In the Matter of

RETURN DATE: 03/15/2023 @ 9 AM

GARY M. REPACK, JR.
MELISSA W. REPACK

CASE NO. 22-13754-CMG

Chapter 13

SUPPLEMENTAL CERTIFICATION OF DEBTOR

Gary M. Repack, Jr., does hereby certify:

1. I am one of the debtors herein and I make this certification in opposition to the trustee's motion to dismiss our case. This case was filed for the primary purpose of saving our home from foreclosure by addressing the significant mortgage loan arrearage through loan modification, as well as the "stripping off" of subordinate liens.

2. We have diligently pursued obtaining a loan modification, but continuously encountered difficulties and delay with our loan servicer. Recently, on March 3, 2023, I had a video conference call with Crystal of the loss mitigation department of our mortgage servicer concerning the status of our loan modification application. I learned that there had been some misdirection of documentation we provided, and mis-communication of requirements and status, as well as confusion about the status of our bankruptcy proceedings. In any case, I was able to confirm with

Crystal that the lender is indeed currently processing a loan modification for us, and I am immediately getting them the additional documentation that she requested.

3. I therefore respectfully request that the trustee's motion be denied, or alternatively, that it be adjourned for sixty days to allow us to obtain loan modification approval.

I hereby certify that the foregoing statements made by me are true to the best of my knowledge, information and belief. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: March 6, 2023

/s/ Gary M. Repack, Jr.